

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF MISSISSIPPI  
(ABERDEEN)**

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**In re:**

**Maritime Communications/Land Mobile, LLC,  
Debtor.**

**Case No. 11--13463-DWH  
Chapter 11**

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**PINNACLE NATIONAL BANK'S RESPONSE TO DEBTOR'S EMERGENCY  
MOTION TO AUTHORIZE FINANCING PURSUANT TO 11 U.S.C. SECTION 364**

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In response to Debtor's Emergency Motion to Authorize Financing Pursuant to 11 U.S.C. Section 364 (the "Motion") (ECF 28) and regarding the Order Granting, on an Interim Basis, Emergency Motion to Authorize Financing Pursuant to 11 U.S.C. Section 364 (the "Order") (ECF 68), Pinnacle National Bank ("Pinnacle") states:

1. Pursuant to the Order, the further hearing on the Motion is set for October 18, 2011 at 10:00 a.m.
2. Pinnacle is Debtor's primary creditor and holds a first priority security interest in various collateral to secure a debt in excess of \$8 million.
3. Pinnacle filed an Objection to the Motion (ECF 52). Pinnacle's Objection was resolved at the preliminary hearing on the Motion. The resolution was incorporated into the Order.
4. Pinnacle has no objection to the additional proposed financing so long as it is on the same terms as set forth in the Order. Pinnacle understands that Debtor and the new lender seek such terms.
5. Pinnacle respectfully reserves the right to supplement this Response.

WHEREFORE, THE ABOVE PREMISES CONSIDERED, Pinnacle prays that:

1. After a hearing, the Motion be resolved on the same terms as set forth in the Order for the additional financing.

2. Pinnacle have such further and other relief to which it may be entitled.

Respectfully submitted,

BASS, BERRY & SIMS PLC

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*Attorney for Pinnacle National Bank*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing document has been served via the Court's electronic filing system and/or regular first class U.S. mail, postage prepaid, upon the following parties this 17th day of October, 2011 and others as indicated on the Notice of Electronic Filing:

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*U. S. Trustee*

/s/ Stephen W. Ragland  
Stephen W. Ragland